

FILED

MAY 21 2008

MARTIN C. ASHMAN
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)

v.)

BENY GARNEATA,)
DUMITRU CURESCU,)
LAVINIA CURESCU,)
TEOFIL SCORTE,)
WILLIAM WELLHAUSEN,)
VASILE FOFIU and)
MARIO OLIVELLA)

No. 08 CR 398

Magistrate Judge Martin C. Ashman

**MOTION TO AMEND ORDER TO SEAL CRIMINAL
COMPLAINT, AFFIDAVIT AND ARREST WARRANTS**

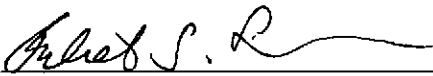
The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves to amended its previously filed motion to seal the contents of the above criminal complaint, affidavit in support of the criminal complaint and arrest warrants. In support of its Motion, the government states as follows:

1. Agents anticipate arresting defendant Beny Garneata before arresting the other defendants charged in the complaint.
2. If the contents of the complaint, affidavit and warrant are made public after the arrest of Garneata, but prior to the arrest of the other defendants, the other defendants may take action to impede any further investigation and may also interfere with their arrests.

WHEREFORE, the United States respectfully requests this Court to enter an Order placing the complaint, affidavit, arrest warrant and this Motion under seal for until and including November 20, 2008 or until the time that Beny Garneata and any of the other defendants is arrested, or until further order of this Court.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

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